

IN THE NORTHERN DISTRICT OF OKLAHOMA  
UNITED STATES OF AMERICA

(1) PHILIP SANDERS, an )  
Individual and Husband and )  
Next of Kin of BRENDA JEAN )  
SANDERS, Deceased, )  
Plaintiff, )  
-vs- ) No. 17-cv-492-JHP-FHM  
(1) CREEK COUNTY BOARD OF )  
COUNTY COMMISSIONERS, and )  
(2) SHERIFF BRET BOWLING, )  
in his official capacity as )  
Creek County Sheriff, and )  
(3) TURN KEY HEALTH CLINICS,)  
a limited liability company, )  
Defendants. )

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**DEPOSITION OF CLASSICA GODWIN**

TAKEN ON BEHALF OF THE PLAINTIFF

TAKEN AT 7447 SOUTH LEWIS AVENUE

TULSA, OKLAHOMA

JUNE 17, 2020

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REPORTED BY: RACHAEL A. ROPER, RPR

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EXHIBIT

1 Q. Is that a --

2 A. Yes, yes.

3 Q. Do you know if you were already in L pod when  
4 Brenda came to L pod or if Brenda was in L pod and  
5 you showed up at L pod?

6 A. I think she was already there, but when they  
7 brought her -- or when I came she had just got back  
8 from a holding cell maybe.

9 Q. So when you first saw her she was being brought in  
10 to the cell from somewhere?

11 A. Uh-huh.

12 Q. Does that sound right?

13 A. Yes, yes.

14 Q. Do you have any idea what the date was when that  
15 happened?

16 A. No.

17 Q. How would you describe Brenda when you first saw  
18 her as far as how she was acting?

19 A. Weak. That's -- I mean, when she came in they  
20 had -- she had a boat, like they called them boats  
21 that -- because it was overpopulated and somebody  
22 had to carry it for her because she could not lift  
23 it, and usually, you know, if you come in with a  
24 boat you carry it with you along with your things  
25 and she had to have help.

1 Q. What's a boat?  
2 A. A plastic 6-foot bed.  
3 Q. Are you saying boat or bunk?  
4 A. A boat. It's called a boat because you can carry  
5 it. It's shaped like a canoe, you know, in a way.  
6 It's just something that they give people to sleep  
7 in when it's overpopulated, like there was no more  
8 beds, top or bottom, there was so many people there.  
9 Q. So she had one of the boats with her, but somebody  
10 else was carrying it?  
11 A. Uh-huh.  
12 Q. Is that a yes?  
13 A. Yes.  
14 Q. Where did her boat go in the cell?  
15 A. When I noticed that she was Brenda, you know, like  
16 I had them put it at the foot of my bed, you know,  
17 because she didn't look healthy and she was somebody  
18 that I knew outside of there, so I felt -- you know,  
19 like I didn't feel like I had to do it, you know,  
20 just something in me. You know, I was just like,  
21 "Just move her over here. Just in case she needs  
22 help, I can help her." I was able, so --  
23 Q. While you and Brenda were in L pod, what would you  
24 say her eating habits were like?  
25 A. She ate very little.

- 1 Q. What about fluid intake?
- 2 A. Well, they gave very little, so -- I mean, it was  
3 just little cups that they filled up with the  
4 tray -- along with the trays and we could use that  
5 cup and go to the bathroom and fill it up  
6 afterwards, but she just drank that serving, really.
- 7 Q. How about her sleep patterns?
- 8 A. She slept most of the day.
- 9 Q. Did you ever see -- you know who Turn Key is -- do  
10 you know who Turn Key is? You may not.
- 11 A. Is it the nursing staff?
- 12 Q. Yeah. That's the company that provides the nursing  
13 staff.
- 14 MS. THOMPSON: Object to improper answer by  
15 counsel. There is no question.
- 16 Q. (By Mr. Richardson) So if I told you that Turn Key  
17 was the company that supplied the staff to provide  
18 medical care, would you know whether that was  
19 accurate or not?
- 20 A. Yes.
- 21 Q. Do you remember any of the individuals that worked  
22 for Turn Key?
- 23 A. No.
- 24 Q. Did you ever know a Nicholas Groom?
- 25 A. Sounds familiar.

1 Q. If Nicholas was standing in here, do you think you  
2 would recognize him?

3 A. Yes.

4 Q. What is it inmates would have to do to get any  
5 medical attention?

6 A. They would have to request -- they would have to  
7 request a form and the form was a request to see the  
8 nurse, and they didn't just have them extra laying  
9 around, like you would have to request them or get  
10 their attention, whoever, you know, and -- like the  
11 nurses, when they bring medicine and pass them out,  
12 they do have them on their cart.

13 Q. Would inmates ever get medical request forms from  
14 the detention officers?

15 A. Yes, if they felt like bringing them -- if they  
16 felt like going back and bringing them, but that was  
17 really rare.

18 Q. So really the best way to get them was when the  
19 nurse --

20 A. Yes.

21 Q. -- passed meds?

22 A. And she wasn't waiting for you to fill them out,  
23 you know, you just have to catch them on another  
24 day.

25 Q. Do you know if you ever filled out a medical

1           request for yourself while you were there?

2 A. No.

3 Q. Did Brenda ever start having diarrhea while she was  
4       in the L pod?

5 A. Yes.

6 Q. Do you know what day that started?

7 A. No. When she was brought in she smelt like  
8       diarrhea, so it could have been before or -- because  
9       she was in there before I was, definitely.

10 Q. If you could smell the diarrhea, could you see it  
11      anywhere?

12 A. No.

13 Q. While you were in the cell with Brenda in L pod,  
14      did Brenda's condition ever get better?

15 A. No.

16 Q. While you were in the L pod with Brenda, did her  
17      condition ever get worse?

18 A. My own opinion, yes, but I'm no doctor.

19 Q. Did Brenda ever tell you what was wrong with her?

20 A. No.

21 Q. Based on what you saw, did you -- strike that.

22           Did you ever have any conversations with any  
23      nursing staff in regards to Brenda?

24 A. Yes. I asked for a request, a request paper, if  
25      that's what she needed, you know, because that's

1       what they were saying, is "She would have to fill  
2       out this form in order for us to see her," and they  
3       kept moving.

4       Q. So when you originally talked to nursing staff  
5       about Brenda, were you asking for a request form or  
6       were you asking them to check on Brenda?

7       A. I asked them to check on her first and they told me  
8       that I had to get a -- I mean, she had to fill out a  
9       request form.

10      Q. So did you ask them on that day for a request form?

11      A. Yes.

12      Q. And were you given one?

13      A. Uh-huh.

14      Q. What did you do with the request form that you got?

15      A. Gave it to Brenda.

16      Q. Do you know if Brenda ever filled out the request  
17       form?

18      A. I don't have no idea.

19      Q. Now, are writing utensils readily available in  
20       jail?

21      A. Yes.

22      Q. Where do you get those from?

23      A. If you have no money they give you indigent  
24       packages with people with no money on their books  
25       and they give you paper, pencil and -- you know,

1       most of the girls have been there -- you know, they  
2       are overloaded everywhere, so if she didn't have  
3       that, then we were able to find anything.

4       Q. Do you know if Brenda ever received an indigent  
5       package?

6       A. I don't know.

7       Q. Did you know any of the other inmates that were  
8       housed with you-all besides Brenda?

9       A. Yes. Everybody that's in jail usually was  
10      repetitive people.

11      Q. It became a meeting area?

12      A. Yeah.

13      Q. Were you aware of when they moved Brenda from the  
14      L pod the last time you saw her?

15      A. Uh-huh.

16      Q. Do you know who it is that moved her?

17      A. No.

18      Q. Do you know what day it was that they moved her?

19      A. No.

20      Q. Do you know what time it was that they moved her?

21      A. The middle of the night.

22      Q. Did you know where she was going?

23      A. Medical.

24      Q. Why did you believe she was going to medical?

25      A. I believe because she kept using the restroom on

1       herself and it was becoming, you know, like a  
2       problem in the pod really, like in -- they were  
3       tired of, you know, them not getting her attention,  
4       that it almost became an uproar.

5       Q. Was the smell bad?

6       A. Uh-huh.

7       Q. Is that a yes?

8       A. Yes.

9       Q. And was that smell bothering the other inmates?

10      A. Yes.

11      Q. When they moved Brenda on that occasion, did you  
12       ever see her again?

13      A. No.

14      Q. Was there any question in your mind seeing Brenda  
15       as to whether she was sick?

16      A. Yes.

17      Q. Did you know she was sick?

18      A. Like I said, I'm no doctor, but from what I was  
19       seeing and people -- you know, like most people even  
20       at her age, you know, like could walk, talk, sleep,  
21       get up and eat. You know, it was just not in her  
22       to -- you know, like days after days it looked like  
23       she was just getting weaker and weaker, and waking  
24       up in the middle of the night, really, was what  
25       scared me.

1 Q. Let me maybe ask the question this way: Would it  
2 be obvious to anyone that saw her that she needed  
3 medical attention?

4 A. Yes.

5 MS. THOMPSON: Object to form.

6 Q. (By Mr. Richardson) Now, I've been trying to get a  
7 hold of you for a couple of months, haven't I?

8 A. Yes.

9 Q. And we've been unable to make contact; is that  
10 right?

11 A. Yes.

12 Q. We subpoenaed you to be here today; correct?

13 A. Yes.

14 Q. And so you showed up under that scenario. Have you  
15 and I had an opportunity to talk about this case?

16 A. This morning.

17 Q. Okay. Did I show you any documents?

18 A. No.

19 Q. What did you and I talk about?

20 A. Just how -- I mean what I'm here for and, you know,  
21 what you-all need from me.

22 Q. And what is it I told you we need from you?

23 A. The truth.

24 Q. And is that what you've told us today?

25 A. Yes.

- 1 Q. How many occasions did that happen?
- 2 A. It happened twice before they actually came and  
3 took her to medical.
- 4 Q. Okay. Do you recall the first time she woke up in  
5 the middle of the night and didn't know where she  
6 was?
- 7 A. Yes, it's in my memory, but I don't know  
8 specifically.
- 9 Q. Do you know how many days after she arrived in the  
10 L pod did that happen?
- 11 A. It was like two days afterwards.
- 12 Q. And did you wake up?
- 13 A. Yes, I was up reading at that time. I slept all  
14 day as it was and I woke up in the middle of the  
15 night and just spent a few hours awake reading or  
16 watching TV by --
- 17 Q. Was Brenda -- go ahead.
- 18 A. By myself usually, is what I was going to say.
- 19 Q. So you were already awake when Brenda woke up;  
20 correct?
- 21 A. Uh-huh.
- 22 Q. And was Brenda sleeping next to you on her cot?
- 23 A. Yes, at the foot of my bed.
- 24 Q. So what happened after she woke up?
- 25 A. I asked her what was wrong and she was like, "Where

1       am I?" and I was just like, "You need to lay back  
2       down," you know, because it kind of scared me - I'm  
3       a scary person as it is - and she just was like  
4       "Oh," you know, and laid back down.

5           And I don't know if she had an eye condition,  
6       but I know she woke up, like, before and she could  
7       not see nothing and I was like "Oh, my gosh, she's  
8       going blind." I don't know what was going on, but I  
9       definitely felt like she should have had some  
10      attention both those times, you know, like, and --

11     Q. why did you feel that way?

12     A. Because usual people -- you know, like 30 of the  
13      other girls sleep, you know, wake up, go grab their  
14      food happy, you know, sit down, eat, go take their  
15      trays back, you know, and she wasn't doing anything  
16      that anybody else was doing.

17     Q. When she woke up and didn't know where she was, did  
18      she later realize where she was?

19     A. Yeah.

20     Q. And did she go back to sleep?

21     A. Yeah, it was after she had woken up, you know,  
22      during the day, but this was like at 3:00 in the  
23      morning.

24     Q. Did anything else unusual happen at that time when  
25      she woke up and didn't know where she was?

1       "Where am I?" I'm like, "You're in jail. Let's go  
2       lay back down."

3 Q. (By Ms. Thompson) And we're talking about the  
4       second time?

5 A. Yes.

6 Q. And did she lay back down?

7 A. Yes.

8 Q. Did she realize where she was?

9                   MR. RICHARDSON: Objection to form.

10 A. I don't know, but she laid back down. That's it.

11 Q. (By Ms. Thompson) Did anything else happen at that  
12       time?

13                   MR. RICHARDSON: Objection to form.

14 A. (Shakes head back and forth.)

15 Q. (By Ms. Thompson) Did you observe anything else --

16                   MR. RICHARDSON: Objection --

17 Q. (By Ms. Thompson) Did you observe anything else  
18       unusual about Brenda's condition at that time?

19 A. No, other than her eyes were yellow; that's it. I  
20       don't know.

21 Q. Are you aware if Brenda got any treatment for her  
22       eyes?

23 A. I don't know.

24 Q. Could you tell me about the procedure for passing  
25       out medications to the inmates in the L pod.

1 A. There was a nurse cart that came in the morning and  
2 at night.

3 Q. Do you remember what time of day those carts came?

4 A. 7:00 a.m. and 7:00 p.m.

5 Q. Did Brenda take any medications, that you know of?

6 A. I don't know.

7 Q. Did you take any medications?

8 A. No.

9 Q. And you stated earlier that the medical staff had  
10 sick call request forms on the cart with them; is  
11 that correct?

12 A. Yes.

13 Q. And would Brenda or anyone in that pod have an  
14 opportunity to request one of those forms when they  
15 came for med pass?

16 MR. RICHARDSON: Objection to form.

17 A. Yes.

18 Q. (By Ms. Thompson) So if Brenda wanted to get one  
19 of those forms, she would have two chances every day  
20 to get that form from the cart; correct?

21 A. Yes.

22 MR. RICHARDSON: Objection to form.

23 Q. (By Ms. Thompson) And did you ever see Brenda  
24 request that form from the medical cart?

25 A. Yes.